

## EXHIBIT R

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King, et al v Annucci, et al - 6/24/2022 - Meghan Lee King

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF NEW YORK

THE ESTATE OF JOSEPH P. KING, BY

AND THROUGH ITS ADMINISTRATRIX,

AMY KING, and AMY KING IN HER OWN

RIGHT,

Plaintiffs,

v

Index No.: 9:20-CV-1413

ANTHONY J. ANNUCCI, et al,

Defendants.

\_\_\_\_\_ X

DEPOSITION OF: MEGHAN LEE KING

DATE: June 24, 2022

TIME: 11:25 a.m. to 12:10 p.m.

VENUE: WebEx

COPY

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2 APPEARANCES:

3 FOR THE PLAINTIFF:

4 HACH ROSE SCHIRRIPA & CHEVERIE, L.L.P.

5 BY: YAMILE KALKACH, ESQ.

6 112 Madison Avenue

7 New York, New York 10016

8 FOR THE DEFENDANTS:

9 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL

10 BY: AIMEE COWAN, ESQ.

11 300 South State Street, Suite 300

12 Syracuse, New York 13205

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2 I N D E X O F P R O C E E D I N G S

3 MEGHAN LEE KING: Sworn

4 Direct Examination by Ms. Cowan

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## STIPULATIONS

3           It is HEREBY STIPULATED by and among the attorneys  
4        for the respective parties, in accordance with the Federal  
5        Rules of Civil Procedure, that this deposition may be  
6        taken by the Defendant at this time, pursuant to subpoena;  
7           FURTHER STIPULATED, that all objections except as to  
8        the form of the questions and responsiveness of the  
9        answers, be reserved until trial;

10 FURTHER STIPULATED, that the witness may read and  
11 sign the deposition and make any corrections to same  
12 before any Notary Public;

13 AND FURTHER STIPULATED, that if the original  
14 deposition has not been duly signed by the witness and  
15 returned to the attorney taking the deposition by the time  
16 of trial or any hearing in this cause, a certified copy of  
17 the deposition may be used as though it were the original

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2 (The deposition commenced at 11:25  
3 a.m.)

4 THE COURT REPORTER: Ms. King, can I  
5 please have you raise your right hand? Do you swear  
6 or affirm that the testimony you are about to give  
7 today in this cause will be the truth, the whole  
8 truth and nothing but the truth?

9 MS. KING: Yes.

10 MEGHAN KING; Sworn

11 THE COURT REPORTER: Can you please  
12 state your name for the record?

13 THE WITNESS: Meghan King.

14 THE COURT REPORTER: Can you please  
15 spell your name for the record?

16 THE WITNESS: M-E-G-H-A-N K-I-N-G.

17 THE COURT REPORTER: Thank you. The  
18 witness has been sworn.

19 MS. COWAN: Thank you.

20 DIRECT EXAMINATION

21 BY MS. COWAN:

22 Q. Good morning, Ms. King. My name  
23 is Aimee Cowan. I represent some state employees  
24 that are involved in a lawsuit in which your -- your  
25 mother has filed against them. Just a few ground

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2 rules before we get started. Make sure that your  
3 answers are audible. No shaking your head or saying  
4 uh-huh so that we can make sure that the record is  
5 clear, okay?

6 A. Okay.

7 Q. If you don't understand a  
8 question I ask that's totally fine. You can ask me  
9 to rephrase and I'll rephrase it for you, all right?

10 A. Okay.

11 Q. I'm going to try to make sure  
12 that this is as quick as possible so we can get you  
13 out of here. But just make sure you let me finish  
14 asking my question before you start answering so  
15 we're not speaking over each other, all right?

16 A. Okay.

17 Q. Is there anybody else in the room  
18 with you right now?

19 A. No.

20 Q. And can you give me your full  
21 name?

22 A. Meghan Lynn King.

23 Q. Are there any other names that  
24 you've gone by?

25 A. No.

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2 Q. What is your date of birth?

3 A. February 22nd, 1994.

4 Q. Are you on any medications today  
5 that could affect your ability to testify truthfully?

6 A. No.

7 Q. Have you drank any alcohol today?

8 A. No.

9 Q. Other than an attorney have you  
10 discussed this deposition with anybody else?

11 A. No.

12 Q. Now we've --.

13 MS. KALKACH: One quick question off  
14 the record. Are we redacting the birthdates?

15 MS. COWAN: Oh, sure we can do that.

16 MS. KALKACH: Okay. Perfect. I just  
17 --.

18 MS. COWAN: Before I file anything  
19 with the court I always redact birthdates.

20 MS. KALKACH: Okay. Perfect. Thank  
21 you so much.

22 BY MS. COWAN: (Cont'g.)

23 Q. Ms. King, I just went through a  
24 deposition with your brother Joseph. Did you speak  
25 with him at all about his deposition in the -- in the

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2 break in between these two depositions?

3 A. No.

4 Q. Did you review anything in  
5 preparation for this deposition?

6 A. No.

7 Q. Are you currently married?

8 A. No.

9 Q. Have you ever been married?

10 A. No.

11 Q. Do you have any children?

12 A. No.

13 Q. And it's my understanding that  
14 you currently reside with your brother, is that  
15 right?

16 A. Yes.

17 Q. And it's my understanding that  
18 you lived with your brother prior to this residence  
19 as well, correct?

20 A. Yes.

21 Q. What is the highest level of  
22 education you achieved?

23 A. Bachelor's degree.

24 Q. Where did you receive your  
25 bachelors?

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2 A. From SUNY Plattsburgh.

3 Q. What was the degree that you  
4 received from SUNY Plattsburgh?

5 A. A bachelors in criminal justice.

6 Q. When did you receive that?

7 A. Believe it was -- think 2017.

8 Q. Did you receive any other college  
9 education other than SUNY Plattsburgh?

10 A. My first two years was at Hudson  
11 Valley Community College.

12 Q. And then you transferred to SUNY  
13 Plattsburgh?

14 A. Yes.

15 Q. Did you receive a degree from I  
16 think you said Hudson Community College?

17 A. Yes. I received an associate's  
18 degree and then continued on the two -- next two  
19 years.

20 Q. Was your associate's degree also  
21 in criminal justice?

22 A. Yes.

23 Q. Who paid for your college  
24 education?

25 A. I received financial aid.

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2 Q. Were you out of pocket any  
3 expenses?

4 A. Possibly for like books and  
5 things like that but not any like tuition.

6 Q. And when I say that I'm -- I'm  
7 talking about both the community college and SUNY  
8 Plattsburgh. Were you out of pocket any -- any money  
9 for that?

10 A. From what I remember I think it  
11 might have been just books or students loans, but.

12 Q. When did you graduate high  
13 school?

14 A. 2012.

15 Q. Have you received any  
16 certifications or licenses in any area?

17 A. No.

18 Q. Where did you graduate high  
19 school from?

20 A. Moriah Central School.

21 Q. Have you been convicted of any  
22 crime?

23 A. No.

24 Q. Are you currently employed?

25 A. Yes.

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2 Q. Where are you employed?

3 A. I currently work for the Town of  
4 North Greenbush as a court clerk.

5 Q. How long have you had that  
6 position?

7 A. Only since March.

8 Q. March of 2022?

9 A. Yes.

10 Q. Where were you employed before  
11 then?

12 A. Walgreens.

13 Q. How long were you employed at  
14 Walgreens?

15 A. I believe about four years.

16 Q. So since approximately 2018?

17 A. Yes, I believe so.

18 Q. What was your position at  
19 Walgreens?

20 A. Supervisor.

21 Q. Were you supervisor for the  
22 entire four years that you were there?

23 A. Yes, besides I think the first  
24 six months.

25 Q. And were you -- what was your

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2 position for those six months? An associate or  
3 something like that?

4 A. Yeah, just a cashier.

5 Q. Prior to Walgreens were you  
6 employed?

7 A. No.

8 Q. Meghan, your mother Amy King has  
9 filed a lawsuit against some New York State employees  
10 as a result of your father's death in jail in 2018.  
11 So I'm going to be asking you a few questions that  
12 relate to this lawsuit. My first question is are you  
13 familiar with this lawsuit?

14 A. Yes.

15 Q. Are you familiar with the  
16 allegations that your mother has made in the  
17 complaint that she filed?

18 A. Yes.

19 Q. What is your understanding as to  
20 the allegations that she has made?

21 A. Just basically that my father was  
22 neglected inside the prison and responsible for what  
23 led to his death.

24 Q. Now the lawsuit names some  
25 individuals specifically, so I'd like to ask you

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2 about those people if you're familiar with them. Are  
3 you familiar with Jamie Paledeno?

4 A. I don't remember that name.

5 Q. So do you recall any  
6 conversations or correspondence that you ever had  
7 with her?

8 A. No.

9 Q. Same question for Hal Myers. Are  
10 you familiar with Hal Myers?

11 A. No.

12 Q. So did you ever have any  
13 correspondence or any conversations with Hal Myers?

14 A. No.

15 Q. Okay. Now your father was  
16 initially arrested back in 2012, is that right?

17 A. Yes.

18 Q. How old were you in 2012 when he  
19 was arrested?

20 A. I was almost eighteen so I was  
21 seventeen at the time.

22 Q. Where were you living at that  
23 time?

24 A. In Port Henry, New York.

25 Q. Were you living with your father

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2 and your mother and your brother?

3 A. Yes.

4 Q. Now it's my understanding that  
5 your father spent some time in -- in local prison,  
6 Essex County Jail at first, is that right?

7 A. Yes.

8 Q. And then he was incarcerated with  
9 New York State Department of Corrections from 2013  
10 until 2018, is that right?

11 MS. KALKACH: Objection.

12 BY MS. COWAN: (Cont'g.)

13 Q. You can answer.

14 A. Oh, okay. Yes.

15 Q. Are you familiar with the felony  
16 convictions that led to his incarceration?

17 A. Yes.

18 Q. Did you ever speak to him about  
19 those felony convictions?

20 A. Not like in specifically. Just  
21 that they happened.

22 Q. Are you familiar with whether he  
23 had been convicted of any crimes prior to that arrest  
24 in 2012?

25 A. No.

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2 Q. When he began his jail sentence  
3 in 2013 how old were you then?

4 A. I believe I would have been  
5 nineteen.

6 Q. All right. And were you still  
7 living at home with your father and your mother when  
8 he went to prison?

9 A. Yes.

10 Q. Let me ask you a series of  
11 questions about prior to his incarceration. So this  
12 is prior to 2013. Can you describe your relationship  
13 with your dad during that time period?

14 MS. KALKACH: Objection. You can  
15 answer.

16 A. Okay. Yeah, it was always a good  
17 relationship. I was really close with him. Just  
18 like a normal father daughter relationship. We would  
19 do stuff together. He taught me how to drive. He  
20 would bring us to theme parks or concerts. My  
21 brother and my friends he'd bring us. I guess that's  
22 it.

23 BY MS. COWAN: (Cont'g.)

24 Q. Did he help out around the house?

25 A. Yes.

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2 Q. What did he do?

3 A. He did a lot of yard work and  
4 things like that outside whether it was summer or  
5 winter. I remember he always worked, you know,  
6 helping with my grandmother's car, my mom's car  
7 doing, you know, changing oils or shoveling neighbors  
8 driveways or mowing peoples lawns or helping even  
9 other families with -- well, other family members  
10 with yard stuff or things around their house as well.

11 Q. Prior to 2013 was he employed?

12 A. Yes.

13 Q. You recall where he was employed?

14 A. Walmart.

15 Q. In what capacity did he work for  
16 Walmart?

17 A. He worked overnight. I believe  
18 he did stocking.

19 Q. Do you know how long he had that  
20 position?

21 A. I don't remember.

22 Q. Was that a full time or part time  
23 job?

24 A. Full time.

25 Q. Other than Walmart, are you aware

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2 of any other employment he had prior to 2013?

3 A. Yes.

4 Q. Where else did he work?

5 A. He worked for Mountain Lake  
6 Services.

7 Q. And was that also a full time  
8 position?

9 A. Yes.

10 Q. Do you recall what his position  
11 was there?

12 A. It was taking care of adults with  
13 mental disabilities.

14 Q. And did he actually participate  
15 in -- in taking care of those adults or did he have  
16 some other function?

17 A. No, he took care of them.

18 Q. You recall how long he worked for  
19 that company?

20 A. I don't know exactly how long,  
21 but I know it was for a very long time because he  
22 received like, you know, certificates for being there  
23 for so long. So, I mean that's all as I can  
24 remember.

25 Q. Okay. Do you know why he left

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2 that company?

3 A. I believe he didn't have his  
4 license at the time, he lost it. And they required a  
5 driving license to take the residents like to  
6 doctors' appointments and things.

7 Q. What year was that that he left  
8 that company?

9 A. I don't remember exact year.

10 Q. Do you know why your father lost  
11 his license?

12 A. No, I don't remember.

13 Q. Do you know if it was taken away  
14 by the state, by court proceedings? Do you -- you  
15 recall anything about why it was taken away or how it  
16 was taken away?

17 MS. KALKACH: Objection. You can  
18 answer.

19 A. Okay. I just like -- sure. No,  
20 I can't remember.

21 BY MS. COWAN: (Cont'g.)

22 Q. How long did your father not have  
23 a license?

24 A. I don't remember it being a very  
25 long time. I don't remember exact amount of time

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2 though.

3 Q. Okay. Was there a period of time  
4 where he wasn't able to take you to concerts or  
5 school functions or things like that?

6 A. No.

7 Q. What about for Walmart. Did he  
8 have his license when he worked at Walmart?

9 A. Yes.

10 Q. Any other employment that he had  
11 that you can recall prior to 2013?

12 A. No.

13 Q. To your knowledge, did your  
14 father have any substance abuse issues?

15 A. No.

16 Q. Were you familiar with any mental  
17 health conditions he may have been diagnosed with  
18 prior to 2013?

19 A. I believe just depression.

20 Q. Do you know when that diagnosis  
21 was made?

22 A. No.

23 Q. How were you aware that he had  
24 been diagnosed with depression?

25 A. Just like overhearing my mother

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2 and father speaking.

3 Q. Did his depression ever affect  
4 your relationship with him?

5 A. No.

6 Q. Were you aware of any medications  
7 he was prescribed prior to 2013?

8 A. No.

9 Q. What about you? Were you  
10 diagnosed with any mental health conditions prior to  
11 2013?

12 A. No.

13 Q. Okay. I want to switch gears to  
14 during your father's incarceration. So during the  
15 time period of 2013 to 2018. During that time period  
16 were you diagnosed with any mental health conditions?

17 A. Just depression and anxiety.

18 Q. You recall when those diagnoses  
19 were made?

20 A. It probably was 2013 that I  
21 started going to the doctors for it.

22 Q. Where did you treat back in 2013?

23 A. Ticonderoga Health Center.

24 Q. And were you ever told the cause  
25 of your anxiety or depression?

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2 A. After -- like I spoke about what  
3 was going on in my life and they believe it was  
4 because of that but they never flat out said that's  
5 why, but.

6 Q. Now when you say what was going  
7 on in your life, are you referring to your father  
8 going to prison?

9 MS. KALKACH: Objection.

10 A. Yes.

11 BY MS. COWAN: (Cont'g.)

12 Q. Did you ever experience panic  
13 attacks during that time period?

14 A. Yes.

15 Q. How often did you experience  
16 panic attacks from 2013 to 2018?

17 A. In the beginning like closer to  
18 2013 it was a lot more often. But as I started  
19 medication and stuff it -- it got better and didn't  
20 happen as often. Not sure exactly like how many  
21 times or anything.

22 Q. Okay. So back in 2013 how -- how  
23 frequently would you say? Once a week, once a month?

24 A. Maybe once or twice a week.

25 Q. And then you said you were given

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2 medications at some point and it helped with the  
3 panic attacks?

4 A. Yes.

5 Q. What medications were you given?

6 A. Sertraline.

7 Q. Do you recall when you were  
8 prescribed that medication?

9 A. I believe 2013.

10 Q. How long did you take sertraline?

11 A. I'm still actually currently on  
12 it.

13 Q. Okay. What is the current dosage  
14 that you're taking?

15 A. I -- I believe a hundred  
16 milligrams.

17 Q. Has the dosage changed at any  
18 point since 2013?

19 A. Yeah, it's slowly increased.

20 Q. Okay. When was the last time it  
21 was increased?

22 A. Just recently like a month ago.

23 Q. Do you know what caused the panic  
24 attacks that you described having between 2013 and  
25 2018?

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2 A. Yeah, it was just a result --

3 revolving around what was going on like with my  
4 father. Like just the, you know, stress and worry of  
5 him being there.

6 Q. I'm going to ask you a very broad  
7 question and -- and it's okay if you have trouble  
8 answering it. But my question is how did your --  
9 your father's jail sentence change your life?

10 A. It changed a lot. Just like  
11 reacting to things in life in general. It makes you  
12 look at things differently especially graduating high  
13 school and going through college, not having him  
14 there. I mean, he was there to talk to but it's not  
15 like you can just pick up the phone and talk to him  
16 when you need to. Just worrying about him being  
17 there was always, you know, it's contributed to the  
18 anxiety and depression, things like that. And  
19 because of that, you know, when you're depressed you  
20 don't want to do as many things or, yeah.

21 Q. Did your --.

22 A. Basically not having him there.  
23 I'm sorry.

24 Q. If you ever want to take a break  
25 just let me know. I just want to make sure that you

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2 answer the -- whatever question I've asked -- asked  
3 you I want you to make sure you answer it. But if  
4 you ever want to take a break we can do that, okay?

5 A. Okay.

6 Q. After your father's  
7 incarceration, did your relationship change?

8 A. No, not other than him physically  
9 being there.

10 Q. Was he able to send you and your  
11 brother or your mom any money from prison?

12 A. No.

13 Q. Did you visit him in prison?

14 A. Yes.

15 Q. How often did you visit him?

16 A. Every other week I think.

17 Q. How long did those visits last?

18 A. Like half of the day. We'd get  
19 there early in the morning and by, you know, later  
20 afternoon we would -- I think that's when they ended.

21 Q. Did you write your father any  
22 letters? Did he write any letters to you?

23 A. Yes.

24 Q. How often did you write him?

25 A. I probably write him once a week

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2 or so but I -- I didn't write as much because we  
3 spoke on the phone almost every day.

4 Q. That was my next question. I --  
5 I'm --

6 A. Oh, okay.

7 Q. -- you spoke with him on the  
8 phone -

9 A. Yeah.

10 Q. -- almost every day?  
11 A. Yes. Unless like something, you  
12 know, I was busy with things going on in life. But  
13 other than that, yes.

14 Q. During your conversations with  
15 him, did he ever express to you that he wanted to  
16 harm himself in any way?

17 A. No.

18 Q. Did he ever speak to you about  
19 the medications that he'd been prescribed while in  
20 prison?

21 A. No.

22 Q. Did he ever describe to you any  
23 concerns he had about his medications?

24 A. No.

25 Q. Did he ever mention that his

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2 medications had been discontinued?

3 A. No.

4 Q. Were you ever concerned that he  
5 would try to take his own life?

6 A. After the -- after he tried to  
7 yes. But before that no.

8 Q. Okay. And you referenced a -- an  
9 attempted suicide that occurred back in 2016, is that  
10 right?

11 A. Yeah, I believe it was that year.

12 Q. Did you ever speak to him about  
13 that attempt?

14 A. Yeah, I actually I did visited  
15 him in the mental health area of the prison with my  
16 mother basically just about it being, you know,  
17 really heartbreaking.

18 Q. Did he indicate to you why he  
19 attempted suicide?

20 A. Not specifically, no.

21 Q. Did he ever indicate to you that  
22 he would never attempt suicide again or never try to  
23 harm himself again?

24 A. He promised he wouldn't but I  
25 know depression is difficult.

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2 Q. At any point around 2013 to 2018

3 did you ever personally speak with any staff at the  
4 prison he was located at? Any DOCCS personnel or --  
5 or office of mental health personnel or anybody?

6 A. No.

7 Q. Did you ever call anybody with  
8 DOCCS or with O.M.H. during that time period?

9 A. No.

10 Q. Did you ever write any  
11 correspondence or letters to any employees at O.M.H.  
12 or DOCCS during that time period?

13 A. No.

14 Q. Do you know when he was supposed  
15 to be released from prison?

16 A. There was never an exact date. I  
17 just know every couple years he would come up for  
18 parole.

19 Q. Did he ever speak to you about  
20 the parole board hearings that he would attend?

21 A. No, just, I mean, if he was  
22 worried about what questions they'd ask because he'd  
23 want it to go well. But that's it.

24 Q. Are you aware of whether he was  
25 denied parole at these parole board hearings?

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2 A. Not that I remember.

3 Q. Did he ever speak with you about  
4 taking any medications that were not prescribed to  
5 him?

6 A. No.

7 Q. Did he ever discuss with you  
8 being charged with violating prison policies or  
9 regulations?

10 A. No.

11 Q. I'd like to take you up to the  
12 week that was leading up to his -- his death in  
13 November 2018. Did you speak with him on the phone  
14 during that time period?

15 A. Yes.

16 Q. Do you recall the sum and  
17 substance of any conversations that you had with him?

18 A. Just basically what was going on  
19 in life. I mean, he seemed more like upset and  
20 depressed but nothing like specifically that he said.

21 Q. What made it seem to you that he  
22 was more upset and depressed?

23 A. Just his mood.

24 Q. What was his mood like during  
25 those conversations?

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2 A. Just not as, you know, trying to  
3 think how to put it, like lively on the phone. Like  
4 not as -- not laughing as much. Just kind of like  
5 that.

6 Q. Did he ever express concerns to  
7 you that he believed that your mother was going to  
8 leave him?

9 A. No.

10 Q. Did he ever express concerns to  
11 you that your mother was seeing somebody else?

12 A. No.

13 Q. Did he ever ask you to look at  
14 your mother's phone or try to see who she was talking  
15 to on her phone?

16 MS. KALKACH: Objection.

17 A. No.

18 BY MS. COWAN: (Cont'g.)

19 Q. During those conversations, were  
20 you concerned that your father was going to try to  
21 hurt himself?

22 A. No.

23 Q. At any point during those  
24 conversations in -- in the last week before his  
25 death, did you indicate that you were going to

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2 contact his counselor based on the things that he was  
3 saying to you?

4 A. No.

5 Q. Had he ever tell you not to  
6 contact the counselor to discuss what the counselor  
7 what --

8 A. No.

9 Q. -- he was telling you?

10 A. No.

11 Q. Did he ever express any concerns  
12 about his marriage to your mom?

13 A. I mean, just it was not with the  
14 marriage itself. But, you know, just the struggle of  
15 being away.

16 Q. When was -- if you recall, when  
17 was the last time that you physically visited him  
18 prior to his death?

19 A. It would have been a week or two  
20 before.

21 Q. Do you recall the sum and  
22 substance of that visit with him?

23 A. Yeah, I mean, once again, his  
24 mood, you know, just was dampened and stuff like  
25 that. Other than that we still talked about normal

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1 King, et al v Annucci, et al - 6/24/2022 - Meghan Lee King  
2 things.

3 Q. Were you concerned after that  
4 meeting with him about whether he was going to do  
5 something to hurt himself?

6 A. No.

7 Q. Did he repeat to you at any point  
8 during that visit why his mood was different or that  
9 he seemed more depressed than usual?

10 MS. KALKACH: Objection.

11 A. Just hard being far away from his  
12 family. And just the environment of the prison.

13 BY MS. COWAN: (Cont'g.)

14 Q. Had he expressed those concerns  
15 to you prior to that visit?

16 A. Yeah. I mean, that was always an  
17 issue, you know, feeling safe in the prison or just  
18 being away from us and wishing he could be home.

19 Q. Now your father's death was on  
20 November 16th, 2018. And were you still living with  
21 your mother and your brother at that time?

22 A. Yes.

23 Q. How old were you?

24 A. Let me think. Twenty-four.

25 Q. Were you employed at that time?

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2 A. Yes.

3 Q. Was that at -- at Walgreens?

4 A. Yes.

5 Q. During the time that your father  
6 was in prison did you contribute to any household  
7 bills or expenses?

8 A. When I was working at Walgreens  
9 2018 I might have -- I probably contributed, you  
10 know, to groceries and things like that. I was older  
11 so.

12 Q. All right. And was your mom  
13 working full time between that time period --

14 A. Yes.

15 Q. -- 2013 to 2018?

16 A. Yes.

17 Q. Now after your father's death did  
18 you continue to treat for depression and anxiety?

19 A. Yes.

20 Q. Did you continue to treat at  
21 Ticonderoga?

22 A. Yes, up until I moved.

23 Q. When did you move?

24 A. 2019.

25 Q. And I believe you moved to

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1 King, et al v Annucci, et al - 6/24/2022 - Meghan Lee King  
2 Clifton Park now?

3 MS. KALKACH: Objection.

4 A. Saratoga Springs.

5 Q. Saratoga Springs. Did you treat  
6 with anyone in Saratoga Springs for anxiety or  
7 depression?

8 A. Yes, I went to Ellis Primary.

9 Q. How long did you treat at Ellis  
10 for?

11 A. I still do just the location near  
12 me in Clifton Park.

13 Q. Have you treated anywhere else  
14 for anxiety or depression other than Ticonderoga and  
15 Ellis?

16 A. No.

17 Q. After your father's death, were  
18 you prescribed any different medications?

19 A. No.

20 Q. Did your medications change in  
21 any way after your father's death?

22 A. My dosage increased a little bit  
23 once and then once recently.

24 Q. Do you know why your dosage  
25 increased?

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2 A. Just it didn't seem to be working  
3 as well. So they tried just upping the dosage to see  
4 if it helped and it did.

5 Q. Have there been any new mental  
6 health condition diagnoses since your father's death?

7 A. No.

8 Q. As a result of your father's  
9 death, did you inherit anything from his estate?

10 A. No.

11 Q. Did you ever speak to your father  
12 about any plans upon his release like living with him  
13 or starting a business with him or any future plans  
14 like that?

15 A. Just plans like, you know, to  
16 catch up on everything that was missed for those  
17 years. You know take him places we've been since  
18 then and just try to spend a lot of time with him  
19 honestly.

20 Q. I'm going to take a look at my  
21 notes for like two minutes and then we can finish  
22 this up if that's okay with everyone.

23 (Off the record 12:01 p.m.)

24 (On the record 12:07 p.m.)

25 BY MS. COWAN: (Cont'g.)

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2 Q. Just a couple of more questions,

3 Ms. King. You indicated that in the last visit with

4 your father before his death he seemed a little more

5 depressed, is that right?

6 A. Yes.

7 Q. Did you ask him why he seemed

8 that way or ask him if there's anything else going on

9 in his life that was making him seem the way he

10 seemed to you?

11 A. No.

12 Q. During any of the phone calls

13 that you had with him in the week leading up to his

14 death, did -- did he ever indicate that he didn't

15 want to live anymore?

16 A. No.

17 Q. Did he ever state that to you

18 during the -- the years that he was incarcerated?

19 A. No.

20 MS. COWAN: That's all the questions

21 that I have unless your attorney has any questions?

22 MS. KALKACH: No, I don't have any

23 follow ups.

24 MS. COWAN: Okay. All right. We are

25 all set. Thank you very much. I appreciate it.

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2 (The deposition concluded at 12:10

3 p.m.)

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2 STATE OF )  
3 COUNTY OF )

4

5 I, MEGHAN LEE KING, have read the foregoing  
6 record of my testimony taken at the time and place noted  
7 in the heading hereof and do hereby acknowledge:

8 (Please check one)

9 ( ) That it is a true and correct transcript of  
10 same.

11 ( ) With the exceptions noted in the attached  
12 errata sheet, it is a true and correct transcript of same.

13

X

14 MEGHAN LEE KING

15

16 10 Sworn to before me this  
17 11 day of \_\_\_\_\_, 2022.

18 12 X \_\_\_\_\_

19 13 NOTARY PUBLIC

20 14 My Commission Expires:  
21 15 \_\_\_\_\_

22 16

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1 King, et al v Annucci, et al - 6/24/2022 - Meghan Lee King  
2 I, ANTHONY MCCLAIN, do hereby certify that the  
3 foregoing testimony of MEGAN LEE KING was taken by me, in  
4 the cause, at the time and place, and in the presence of  
5 counsel, as stated in the caption hereto, at Page 1  
6 hereof; that before giving testimony said witness was duly  
7 sworn to testify the truth, the whole truth and nothing  
8 but the truth; that the foregoing typewritten  
9 transcription, consisting of pages number 1 to 36,  
10 inclusive, is a true record prepared by me and completed  
11 by Associated Reporters Int'l., Inc. from materials  
12 provided by me.

13   
14 ANTHONY MCCLAIN, Reporter

15

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2 ASSOCIATED REPORTERS INTERNATIONAL, INC.  
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3

Date:

4 Case Name: King v Annucci, et al  
Index Number: 9:20-CV-1413  
5 Deponent: Meghan Lee King  
Deposition Date: 6/24/2022  
6 Examining Attorney: Amy Cowan, A.A.G.

7 Dear Ms. King:

8

Please read and make any changes and/or corrections in  
9 your testimony and sign the transcript in the presence of  
a notary public. Please do so within thirty (30) days.  
10 If you fail to sign the transcript within thirty (30)  
days, it will be delivered to the appropriate parties  
11 without signature. Return the transcript with  
corrections, if any, to:

12

OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL  
13 BY: AIMEE COWAN, ESQ.  
300 South State Street, Suite 300  
14 Syracuse, New York 13205

15

CORRECTIONS:

16

17 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

18 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

19 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

20 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

21 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

22 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

23 \_\_\_\_\_ Word or phrase: \_\_\_\_\_  
Corrected to: \_\_\_\_\_

24 \_\_\_\_\_

Date Signed  
ARI@courtsteno.com

MEGHAN LEE WWW.courtsteno.com

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